# Advanced Passive 1000 (AP1000) Generic Technical Specification Traveler (GTST)

Title: Changes Related to LCO 3.4.15, RCS Pressure Isolation Valve Leakage

I. <u>Technical Specifications Task Force (TSTF) Travelers, Approved Since Revision 2 of STS NUREG-1431, and Used to Develop this GTST</u>

#### **TSTF Number and Title:**

TSTF-479-A, Rev 0, Changes to Reflect Revision of 10 CFR 50.55a

#### **STS NUREGs Affected:**

TSTF-479-A, Rev 0: NUREGs 1430, 1431, 1432, 1433, and 1434

# **NRC Approval Date:**

TSTF-479-A, Rev 0: 06-Dec-05

#### **TSTF Classification:**

TSTF-479-A, Rev 0: Technical Change

# II. Reference Combined License (RCOL) Standard Departures (Std. Dep.), RCOL COL Items, and RCOL Plant-Specific Technical Specifications (PTS) Changes Used to Develop this GTST

## **RCOL Std. Dep. Number and Title:**

There are no Vogtle departures applicable to Specification 3.4.15.

#### **RCOL COL Item Number and Title:**

There are no Vogtle COL items applicable to Specification 3.4.15.

## **RCOL PTS Change Number and Title:**

None

# III. Comments on Relations Among TSTFs, RCOL Std. Dep., RCOL COL Items, and RCOL PTS Changes

This section discusses changes: (1) that were applicable to previous designs, but are not to the current design; (2) that are already incorporated in the GTS; and (3) that are superseded by another change.

TSTF-479-A has been applied to AP1000 GTS 3.4.15, Rev 19 by Westinghouse. TSTF-479-A will not be discussed further as a part of this GTST.

IV.	Additional Changes Proposed as Part of this GTST (modifications proposed by NRC
	staff and/or clear editorial changes or deviations identified by preparer of GTST)

Grammatical errors are corrected in several places in the bases.

# V. Applicability

# **Affected Generic Technical Specifications and Bases:**

Section 3.4.15 RCS Pressure Isolation Valve (PIV) Integrity

**Changes to the Generic Technical Specifications and Bases:** 

Not Applicable

# VI. <u>Traveler Information</u>

**Description of TSTF changes:** 

Not Applicable

**Rationale for TSTF changes:** 

Not Applicable

Description of changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

Not Applicable

Rationale for changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

Not Applicable

Description of additional changes proposed by NRC staff/preparer of GTST:

Grammatical errors are corrected in several places in the bases.

Rationale for additional changes proposed by NRC staff/preparer of GTST:

Provide correct grammer.

# VII. GTST Safety Evaluation

## **Technical Analysis:**

The changes are editorial, clarifying, grammatical, or otherwise considered administrative. These changes do not affect the technical content, but improve the readability, implementation, and understanding of the requirements, and are therefore acceptable.

# References to Previous NRC Safety Evaluation Reports (SERs):

Not Applicable

# VIII. Review Information

#### **Evaluator Comments:**

None

Randy Belles Oak Ridge National Laboratory 865-574-0388 bellesrj@ornl.gov

#### **Review Information:**

Availability for public review and comment on Revision 0 of this traveler approved by NRC staff on Friday, May 16, 2014.

# **NRC Final Approval Date:**

#### **NRC Contact:**

Hien Le United States Nuclear Regulatory Commission (US NRC) 301-415-1511 Hien.Le@nrc.gov

# IX. <u>Evaluator Comments for Consideration in Finalizing Technical Specifications and Bases</u>

The database does not yet recognize non-breaking hyphens or spaces. For Rev. 0 of this GTST, it was necessary to manually insert (1) non-breaking hyphens as necessary to interlock designations such as P-10 to avoid breaking across the end of a line; and (2) non-breaking spaces as necessary to (a) keep symbols such as "≥" with the subsequent value; and (b) avoid stranding a number value on a subsequent line, such as MODE 5.

#### X. References Used in GTST

- 1. AP1000 DCD, Revision 19, Section 16, "Technical Specifications," June 2011 (ML11171A500).
- Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Technical Specifications Upgrade License Amendment Request, February 24, 2011 (ML12065A057).
- 3. NRC Safety Evaluation (SE) for Amendment No. 13 to Combined License (COL) No. NPF-91 for Vogtle Electric Generating Plant (VEGP) Unit 3, and Amendment No. 13 to COL No. NPF-92 for VEGP Unit 4, September 9, 2013, ADAMS Package Accession No. ML13238A337, which contains:

ML13238A355	Cover Letter - Issuance of License Amendment No. 13 for Vogtle Units
	3 and 4 (LAR 12-002).
ML13238A359	Enclosure 1 - Amendment No. 13 to COL No. NPF-91
ML13239A256	Enclosure 2 - Amendment No. 13 to COL No. NPF-92
ML13239A284	Enclosure 3 - Revised plant-specific TS pages (Attachment to
	Amendment No. 13)
ML13239A287	Enclosure 4 - Safety Evaluation (SE), and Attachment 1 - Acronyms
ML13239A288	SE Attachment 2 - Table A - Administrative Changes
ML13239A319	SE Attachment 3 - Table M - More Restrictive Changes
ML13239A333	SE Attachment 4 - Table R - Relocated Specifications
ML13239A331	SE Attachment 5 - Table D - Detail Removed Changes
ML13239A316	SE Attachment 6 - Table L - Less Restrictive Changes

The following documents were subsequently issued to correct an administrative error in Enclosure 3:

ML13277A616	Letter - Correction To The Attachment (Replacement Pages) - Vogtle
	Electric Generating Plant Units 3 and 4-Issuance of Amendment Re:
	Technical Specifications Upgrade (LAR 12-002) (TAC No. RP9402)
ML13277A637	Enclosure 3 - Revised plant-specific TS pages (Attachment to
	Amendment No. 13) (corrected)

- 4. TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," June 2005.
- 5. RAI Letter No. 01 Related to License Amendment Request (LAR) 12-002 for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses, September 7, 2012 (ML12251A355).
- Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Response to Request for Additional Information Letter No. 01 Related to License Amendment Request LAR-12-002, ND-12-2015, October 04, 2012 (ML12286A363 and ML12286A360)

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# XI. MARKUP of the Applicable GTS Section for Preparation of the STS NUREG

The entire section of the Specifications and the Bases associated with this GTST is presented next.

Changes to the Specifications and Bases are denoted as follows: Deleted portions are marked in strikethrough red font, and inserted portions in bold blue font.

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.15 RCS Pressure Isolation Valve (PIV) Integrity

LCO 3.4.15 Leakage from each RCS PIV shall be within limit.

APPLICABILITY: MODES 1, 2, and 3,

MODE 4, with the RCS not being cooled by the Normal Residual Heat

Removal System (RNS).

#### **ACTIONS**

-----NOTES------

- 1. Separate Condition entry is allowed for each flow path.
- 2. Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable PIV.

**REQUIRED ACTION** CONDITION **COMPLETION TIME** A. Leakage from one or -----NOTE----more RCS PIVs not Each valve used to satisfy Required Action A.1 and Required Action A.2 within limit. must have been verified to meet SR 3.4.15.1 and be in the reactor coolant pressure boundary or the high pressure portion of the system. A.1 Isolate the high pressure 8 hours portion of the affected system from the low pressure portion by use of one closed manual, deactivated automatic. or check valve. AND

# ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME	
A. (continued)	A.2	Verify a second OPERABLE PIV can meet the leakage limits. This valve is required to be a check valve, or a closed valve, if it isolates a line that penetrates containment.	72 hours	
B. Required Action and associated Completion Time not met.	B.1 <u>AND</u> B.2	Be in MODE 3.  Be in MODE 5.	6 hours 36 hours	

# SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.15.1	Verify leakage of each RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2215 and ≤ 2255 psig.	24 months

#### B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.15 RCS Pressure Isolation Valve (PIV) Integrity

#### **BASES**

#### **BACKGROUND**

10 CFR 50.2, 10 CFR 50.55a(c), and GDC 55 of 10 CFR 50, Appendix A (Refs. 1, 2, and 3), define the RCS pressure boundary as all those pressure containing components such as pressure vessels, piping, pumps, and valves which are connected to the reactor coolant system, up to and including the outermost containment isolation valve in system piping which penetrates primary reactor containment, the second of two valves normally closed during normal reactor operation in system piping which does not penetrate primary reactor containment, and the reactor coolant system safety and relief valves. This includes any two normally closed valves in series within the reactor coolant pressure boundary (RCPB), which separate the high pressure RCS from an attached low pressure system. During their lives, these valves can experience varying amounts of reactor coolant leakage through either normal operational wear or mechanical deterioration. The AP1000 PIVs are listed in Chapter 3, Table 3.9 18. The RCS PIV Leakage LCO allows RCS high pressure operation when PIV leakage has been verified.

The purpose of this specification is to prevent overpressure failure or degradation of low pressure portions of connecting systems. The following criteria **were** was used in identifying PIVs for inclusion in the specification. A valve was included in this specification if its failure may result in:

- Failure of low pressure portions of connected systems, such as a Loss of Coolant Accident (LOCA) outside of containment, which could place the plant in an unanalyzed condition.
- Degradation of low pressure portions of connected systems, such as damage to a core cooling system, which could degrade a safety related function that mitigates a DBA.

Valves considered for inclusion in this specification are used to isolate the RCS from the following connected systems:

- a. Passive Core Cooling System (PXS) Accumulators;
- b. Normal Residual Heat Removal System (RNS); and

#### **BASES**

#### BACKGROUND (continued)

c. Chemical and Volume Control System (CVS).

The RNS pressure boundary isolation valves are considered to meet the first criterion for inclusion in this specification. The PXS accumulator check valves were determined to meet the second PIV **criterion criteria** for inclusion in this specification. It is determined that the CVS PIVs do not meet either **criterion criteria** for inclusion in this specification.

The PIVs that are addressed by this specification are listed in Chapter 3, Table 3.9-18.

The CVS pressure isolation valves were not included in this specification based on the defined criteria. The justification for excluding the CVS PIVs is discussed in the following paragraph.

The CVS contains four high pressure/low pressure connections with the RCS. Since the portion of the CVS which is located inside reactor containment is designed to full RCS pressure, the high pressure/low pressure interfaces with the RCS are the lines that penetrate the reactor containment. The CVS lines that penetrate containment include the makeup line, the letdown line to the Liquid Radwaste System, the hydrogen supply line, and the demineralizer resin sluice line used to transfer spent resins from the demineralizers to the Solid Radwaste System. These lines each contain two safety related containment isolation valves which are addressed by the Containment Isolation Specification (LCO 3.6.3). In addition to the containment isolation valves in each of the CVS lines that interface with the RCS, there are additional valves in each line that provide diverse isolation capability. Since more restrictive requirements are imposed by LCO 3.6.3, the CVS isolation valves are not included in this LCO.

Since the purpose of this LCO is to verify that the PIVs have not suffered gross failures, the valve leakage test in conjunction with tests specified in the IST program provide an acceptable method of determining valve integrity. The ability of the valves to transition from open to closed provides assurance that the valve can perform its pressure isolation function as required. A small amount leakage through these valves is allowed, provided that the integrity of the valve was demonstrated.

Violation of this LCO could result in continued degradation of a PIV, which could lead to overpressurization of a low pressure system or the failure of a safety related function to mitigate a DBA.

#### **BASES**

#### APPLICABLE SAFETY ANALYSES

Pressure isolation valve integrity is not considered in any design basis accident analyses. This specification provides for monitoring the condition of the reactor coolant pressure boundary to detect degradation which could lead to accidents or which could impair a connected system's ability to mitigate DBAs.

RCS PIV integrity satisfies, Criterion 2 of 10 CFR 50.36(c)(2)(ii).

#### LCO

RCS PIV leakage is identified LEAKAGE into closed systems connected to the RCS. Isolation valve leakage is usually small. Leakage that increases significantly suggests that something is operationally wrong and corrective action must be taken.

The LCO PIV leakage limit is 0.5 gpm per inch nominal valve size up to a maximum of 5 gpm per valve. This limit is well within the makeup capability of the CVS makeup pumps. This leak rate will not result in the overpressure of a connected low pressure system. Reference 5 permits leakage testing at a lower pressure differential than between the specified maximum RCS pressure and the normal pressure of the connected system during RCS operation (the maximum pressure differential) in those types of valves in which the higher service pressure will tend to diminish the overall leakage of the valve. In such cases, the observed leakage rate at lower differential pressures can be assumed to be the leakage at the maximum pressure differential. Verification that the valve leakage diminishes with increasing pressure differential is sufficient to verify that the valve characteristics are such that higher service pressure results in a decrease in overall leakage.

#### **APPLICABILITY**

In MODES 1, 2, and 3 and MODE 4, with RCS not being cooled by the RNS, this LCO applies when the RCS is pressurized.

In MODE 4, with RNS in operation, and MODES 5 and 6, the RCS pressure is reduced and is not sufficient to overpressurize the connected low pressure systems.

#### **BASES**

#### ACTIONS

The ACTIONS are modified by two Notes. Note 1 provides clarification that each flow path allows separate entry into a Condition. This is allowed based upon the functional independence of the flow path. Note 2 requires an evaluation of affected systems if a PIV is inoperable. The pressurization may have affected system OPERABILITY, or isolation of an affected flow path with an alternate valve may have degraded the ability of the interconnected system to perform its safety function.

#### <u>A.1</u>

With one or more PIVs inoperable, the affected flow path(s) must be isolated. Required Action A.1 is modified by a Note that the valves used for isolation must meet the same integrity requirements as the PIVs and must be within the RCPB or the high pressure portion of the system.

Required Action A.1 requires that the isolation with one valve must be performed within 8 hours. Eight hours provides time to verify IST compliance for the alternate isolation valve and isolate the flow path. The 8 hour Completion Time allows the actions and restricts the operation with inoperable isolation valves.

#### A.2

Required Action A.2 specifies verification that a second OPERABLE PIV can meet the leakage limits. This valve is required to be a check valve, or a closed valve, if it isolates a line that penetrates containment. For the accumulator valves, the normally open accumulator isolation valve is a suitable replacement PIV, but can remain open because leakage into the accumulator is continuously monitored. If leakage into the accumulators increased to the allowable operational leakage limit, then the valve could be used to isolate the accumulators from the RCS.

The 72 hour Completion Time allows the actions and restricts the operation with inoperable isolation valves.

#### B.1 and B.2

If PIV integrity cannot be restored, the system isolated, or the other Required Actions accomplished, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. This Action may reduce the leakage and reduces the potential for a LOCA outside containment.

#### **BASES**

#### SURVEILLANCE REQUIREMENTS

#### SR 3.4.15.1

Performance of leakage testing on each RCS PIV or isolation valve used to satisfy Required Action A.1 and Required Action A.2 is required to verify that leakage is below the specified limit and to identify each leaking valve. The leakage limit of 0.5 gpm per inch nominal valve size up to a minimum of 5 gpm applies to each valve. Leakage testing requires a stable pressure condition.

For the two PIVs in series, the leakage requirement applies to each valve individually and not to the combined leakage across both valves. If the PIVs are not individually leakage tested, one valve may have failed completely and not be detected if the other valve in series meets the leakage requirement. In this situation, the protection provided by redundant valves would be lost.

Testing shall be performed every 24 months, a typical refueling cycle. The 24 month Frequency is consistent with 10 CFR 50.55a(g) (Ref. 4) as contained in the Inservice Testing Program and is within frequency allowed by the American Society of Mechanical Engineers (ASME) OM Code (Ref. 5).

#### REFERENCES

- 1. 10 CFR 50.2.
- 2. 10 CFR 50.55a(c).
- 3. 10 CFR 50, Appendix A, Section V, GDC 55.
- 4. 10 CFR 50.55a(g).
- 5. ASME OM Code, "Code for Operation and Maintenance of Nuclear Power Plants."

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# XII. Applicable STS Subsection After Incorporation of this GTST's Modifications

The entire subsection of the Specifications and the Bases associated with this GTST, following incorporation of the modifications, is presented next.

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.15 RCS Pressure Isolation Valve (PIV) Integrity

LCO 3.4.15 Leakage from each RCS PIV shall be within limit.

APPLICABILITY: MODES 1, 2, and 3,

MODE 4, with the RCS not being cooled by the Normal Residual Heat

Removal System (RNS).

#### **ACTIONS**

-----NOTES------

1. Separate Condition entry is allowed for each flow path.

2. Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable PIV.

**REQUIRED ACTION** CONDITION **COMPLETION TIME** A. Leakage from one or -----NOTE----more RCS PIVs not Each valve used to satisfy Required Action A.1 and Required Action A.2 within limit. must have been verified to meet SR 3.4.15.1 and be in the reactor coolant pressure boundary or the high pressure portion of the system. A.1 Isolate the high pressure 8 hours portion of the affected system from the low pressure portion by use of one closed manual, deactivated automatic. or check valve. AND

ACTIONS (continued)

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2	Verify a second OPERABLE PIV can meet the leakage limits. This valve is required to be a check valve, or a closed valve, if it isolates a line that penetrates containment.	72 hours
B. Required Action and associated Completion Time not met.	B.1 <u>AND</u> B.2	Be in MODE 3.  Be in MODE 5.	6 hours 36 hours

# SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.15.1	Verify leakage of each RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2215 and ≤ 2255 psig.	24 months

#### B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.15 RCS Pressure Isolation Valve (PIV) Integrity

#### **BASES**

#### **BACKGROUND**

10 CFR 50.2, 10 CFR 50.55a(c), and GDC 55 of 10 CFR 50, Appendix A (Refs. 1, 2, and 3), define the RCS pressure boundary as all those pressure containing components such as pressure vessels, piping, pumps, and valves which are connected to the reactor coolant system, up to and including the outermost containment isolation valve in system piping which penetrates primary reactor containment, the second of two valves normally closed during normal reactor operation in system piping which does not penetrate primary reactor containment, and the reactor coolant system safety and relief valves. This includes any two normally closed valves in series within the reactor coolant pressure boundary (RCPB), which separate the high pressure RCS from an attached low pressure system. During their lives, these valves can experience varying amounts of reactor coolant leakage through either normal operational wear or mechanical deterioration. The AP1000 PIVs are listed in Chapter 3, Table 3.9 18. The RCS PIV Leakage LCO allows RCS high pressure operation when PIV leakage has been verified.

The purpose of this specification is to prevent overpressure failure or degradation of low pressure portions of connecting systems. The following criteria were used in identifying PIVs for inclusion in the specification. A valve was included in this specification if its failure may result in:

- Failure of low pressure portions of connected systems, such as a Loss of Coolant Accident (LOCA) outside of containment, which could place the plant in an unanalyzed condition.
- Degradation of low pressure portions of connected systems, such as damage to a core cooling system, which could degrade a safety related function that mitigates a DBA.

Valves considered for inclusion in this specification are used to isolate the RCS from the following connected systems:

- a. Passive Core Cooling System (PXS) Accumulators;
- b. Normal Residual Heat Removal System (RNS); and

#### **BASES**

#### BACKGROUND (continued)

#### c. Chemical and Volume Control System (CVS).

The RNS pressure boundary isolation valves are considered to meet the first criterion for inclusion in this specification. The PXS accumulator check valves were determined to meet the second PIV criterion for inclusion in this specification. It is determined that the CVS PIVs do not meet either criterion for inclusion in this specification.

The PIVs that are addressed by this specification are listed in Chapter 3, Table 3.9-18.

The CVS pressure isolation valves were not included in this specification based on the defined criteria. The justification for excluding the CVS PIVs is discussed in the following paragraph.

The CVS contains four high pressure/low pressure connections with the RCS. Since the portion of the CVS which is located inside reactor containment is designed to full RCS pressure, the high pressure/low pressure interfaces with the RCS are the lines that penetrate the reactor containment. The CVS lines that penetrate containment include the makeup line, the letdown line to the Liquid Radwaste System, the hydrogen supply line, and the demineralizer resin sluice line used to transfer spent resins from the demineralizers to the Solid Radwaste System. These lines each contain two safety related containment isolation valves which are addressed by the Containment Isolation Specification (LCO 3.6.3). In addition to the containment isolation valves in each of the CVS lines that interface with the RCS, there are additional valves in each line that provide diverse isolation capability. Since more restrictive requirements are imposed by LCO 3.6.3, the CVS isolation valves are not included in this LCO.

Since the purpose of this LCO is to verify that the PIVs have not suffered gross failures, the valve leakage test in conjunction with tests specified in the IST program provide an acceptable method of determining valve integrity. The ability of the valves to transition from open to closed provides assurance that the valve can perform its pressure isolation function as required. A small amount leakage through these valves is allowed, provided that the integrity of the valve was demonstrated.

Violation of this LCO could result in continued degradation of a PIV, which could lead to overpressurization of a low pressure system or the failure of a safety related function to mitigate a DBA.

#### **BASES**

#### APPLICABLE SAFETY ANALYSES

Pressure isolation valve integrity is not considered in any design basis accident analyses. This specification provides for monitoring the condition of the reactor coolant pressure boundary to detect degradation which could lead to accidents or which could impair a connected system's ability to mitigate DBAs.

RCS PIV integrity satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

#### LCO

RCS PIV leakage is identified LEAKAGE into closed systems connected to the RCS. Isolation valve leakage is usually small. Leakage that increases significantly suggests that something is operationally wrong and corrective action must be taken.

The LCO PIV leakage limit is 0.5 gpm per inch nominal valve size up to a maximum of 5 gpm per valve. This limit is well within the makeup capability of the CVS makeup pumps. This leak rate will not result in the overpressure of a connected low pressure system. Reference 5 permits leakage testing at a lower pressure differential than between the specified maximum RCS pressure and the normal pressure of the connected system during RCS operation (the maximum pressure differential) in those types of valves in which the higher service pressure will tend to diminish the overall leakage of the valve. In such cases, the observed leakage rate at lower differential pressures can be assumed to be the leakage at the maximum pressure differential. Verification that the valve leakage diminishes with increasing pressure differential is sufficient to verify that the valve characteristics are such that higher service pressure results in a decrease in overall leakage.

#### **APPLICABILITY**

In MODES 1, 2, and 3 and MODE 4, with RCS not being cooled by the RNS, this LCO applies when the RCS is pressurized.

In MODE 4, with RNS in operation, and MODES 5 and 6, the RCS pressure is reduced and is not sufficient to overpressurize the connected low pressure systems.

#### **BASES**

#### ACTIONS

The ACTIONS are modified by two Notes. Note 1 provides clarification that each flow path allows separate entry into a Condition. This is allowed based upon the functional independence of the flow path. Note 2 requires an evaluation of affected systems if a PIV is inoperable. The pressurization may have affected system OPERABILITY, or isolation of an affected flow path with an alternate valve may have degraded the ability of the interconnected system to perform its safety function.

#### <u>A.1</u>

With one or more PIVs inoperable, the affected flow path(s) must be isolated. Required Action A.1 is modified by a Note that the valves used for isolation must meet the same integrity requirements as the PIVs and must be within the RCPB or the high pressure portion of the system.

Required Action A.1 requires that the isolation with one valve must be performed within 8 hours. Eight hours provides time to verify IST compliance for the alternate isolation valve and isolate the flow path. The 8 hour Completion Time allows the actions and restricts the operation with inoperable isolation valves.

#### A.2

Required Action A.2 specifies verification that a second OPERABLE PIV can meet the leakage limits. This valve is required to be a check valve, or a closed valve, if it isolates a line that penetrates containment. For the accumulator valves, the normally open accumulator isolation valve is a suitable replacement PIV, but can remain open because leakage into the accumulator is continuously monitored. If leakage into the accumulators increased to the allowable operational leakage limit, then the valve could be used to isolate the accumulators from the RCS.

The 72 hour Completion Time allows the actions and restricts the operation with inoperable isolation valves.

#### B.1 and B.2

If PIV integrity cannot be restored, the system isolated, or the other Required Actions accomplished, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. This Action may reduce the leakage and reduces the potential for a LOCA outside containment.

#### **BASES**

#### SURVEILLANCE REQUIREMENTS

## SR 3.4.15.1

Performance of leakage testing on each RCS PIV or isolation valve used to satisfy Required Action A.1 and Required Action A.2 is required to verify that leakage is below the specified limit and to identify each leaking valve. The leakage limit of 0.5 gpm per inch nominal valve size up to a minimum of 5 gpm applies to each valve. Leakage testing requires a stable pressure condition.

For the two PIVs in series, the leakage requirement applies to each valve individually and not to the combined leakage across both valves. If the PIVs are not individually leakage tested, one valve may have failed completely and not be detected if the other valve in series meets the leakage requirement. In this situation, the protection provided by redundant valves would be lost.

Testing shall be performed every 24 months, a typical refueling cycle. The 24 month Frequency is consistent with 10 CFR 50.55a(g) (Ref. 4) as contained in the Inservice Testing Program and is within frequency allowed by the American Society of Mechanical Engineers (ASME) OM Code (Ref. 5).

#### REFERENCES

- 1. 10 CFR 50.2.
- 2. 10 CFR 50.55a(c).
- 3. 10 CFR 50, Appendix A, Section V, GDC 55.
- 4. 10 CFR 50.55a(g).
- 5. ASME OM Code, "Code for Operation and Maintenance of Nuclear Power Plants."